

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|------------------------------|---|-----------------------|
| RICHARD F. WHITE, JR., | : | |
| | : | C.A. NO.: 05-53 GMS |
| Plaintiff, | : | |
| | : | DEMAND FOR JURY TRIAL |
| v. | : | |
| | : | |
| FEDERAL EXPRESS CORPORATION, | : | |
| | : | |
| Defendant. | : | |

**NOTICE OF DEPOSITION DUCES TECUM OF
DISABATINO BROTHERS, INC. on JULY 8, 2005 at 2:00 p.m.**

TO: Michael I. Silverman, Esquire
Silverman & McDonald
1010 N. Bancroft Parkway, Suite 22
Wilmington, DE 19805

PLEASE TAKE NOTICE that the undersigned will take the deposition* of the Records Custodian of the below listed entity at the offices of Tybout, Redfearn & Pell, 300 Delaware Avenue, 11th Floor, Wilmington, Delaware on **July 8, 2005 at 2:00 p.m.**

DISABATINO BROTHERS, INC.

TYBOUT, REDFEARN & PELL

/s/ David G. Culley

DAVID G. CULLEY, ESQUIRE
Delaware Bar I.D. 2141
300 Delaware Avenue, Suite 1100
P.O. Box 2092
Wilmington, DE 19899
(302) 658-6901
E-mail Address: dculley@trplaw.com
Attorneys for Defendant

cc: DISABATINO BROTHERS, INC.

* DUCES TECUM: **Deponent DISABATINO BROTHERS, INC. is to produce a copy of any and all personnel (employment) records on employee**

RICHARD F. WHITE, JR. (DOB: [REDACTED]) (SSN: [REDACTED])
including but not limited to payroll records, applications for
employment, contracts or similar records of employment, job
descriptions, any other terms &/or conditions of employment.

NOTE: YOUR APPEARANCE IS WAIVED IF THE RECORDS ARE RECEIVED IN THIS
OFFICE ON OR BEFORE THE DEPOSITION DATE.